

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

NATHANIEL GARRETT DENNISON,

Plaintiff,

- against -

STORYFUL AMERICAS, LLC

Defendant.

Docket No. 1:20-cv-00698 (LGS)

**NOTICE OF MOTION**

**PLEASE TAKE NOTICE** that, upon this Notice of Motion; the Declaration of James H. Freeman and exhibits attached thereto, the memorandum of law in support thereof and exhibits attached thereto; and the pleadings and prior proceedings herein; James H. Freeman, an associate attorney of Liebowitz Law Firm, PLLC (“LLF”) will move the Court, before the Honorable Lorna G. Schofield (U.S.D.J.) at the United States District Court, 40 Foley Square, Courtroom 1106, New York, NY 10007, at a time and date set by the Court for an Order GRANTING undersigned counsel’s motion to withdraw as counsel of record for plaintiff Nathaniel Garrett Dennison (“Plaintiff”) under Local Rule 1.4; for an Order directing the Clerk of Court to amend the docket so as to designate LLF as an interested party in this action and to permit Freeman to remain as counsel on behalf of LLF; for an Order providing that this Court will retain jurisdiction to enforce the terms of the fully executed Settlement Agreement b/w plaintiff Nathaniel Garrett Dennison (“Plaintiff”) and defendant Storyful Americas, LLC (“Defendant”); and for reservation of right to file an application for attorneys’ charging lien in favor of LLF.

**PLEASE TAKE FURTHER NOTICE**, that undersigned counsel respectfully requests that the Court STAY the action for at least thirty (30) days to permit Plaintiff to retain substitute counsel.

**PLEASE TAKE FURTHER NOTICE** that in the event the action is not stayed, then pursuant to Local Rule 6.1(a) and 6.3, opposition papers, if any, must be served by December 21, 2020; and LLF's reply, if any, must be served by December 28, 2020.

Dated: Valley Stream, New York  
December 7, 2020

Respectfully submitted,

LIEBOWITZ LAW FIRM, PLLC

**By: /s/jameshfreeman/**  
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**TO:**

Nathanial Garrett Dennison  
[ndennison@throughmyeyesfoundation.org](mailto:ndennison@throughmyeyesfoundation.org)

*Plaintiff*

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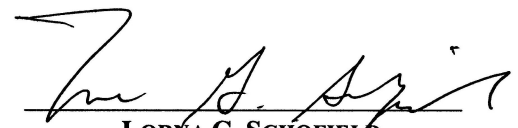
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The application is GRANTED in part and DENIED in part. Attorney James H. Freeman is hereby withdrawn from this action as counsel for Plaintiff without prejudice to the Liebowitz Law Firm's right to file an application for an attorneys' charging lien. See New York Rules of Professional Conduct Rule 1.16(b)(3). This action is stayed until **January 8, 2021**, for the purpose of permitting Plaintiff to seek alternative counsel. The Court will not retain jurisdiction to enforce the terms of the Settlement Agreement.

The Clerk of Court is respectfully directed to designate the Liebowitz Law Firm, PLLC ("LLF") as an interested party and assign Attorney James H. Freeman as counsel for LLF.

SO ORDERED.

Dated: December 10, 2020  
New York, New York

  
**LORNA G. SCHOFIELD**  
UNITED STATES DISTRICT JUDGE

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*Counsel for Defendant*